

From: BJ Eaden [b\_eaden@comcast.net]  
Sent: Friday, January 12, 2007 4:49 PM  
To: Taskforcecomments  
Subject: Comments -

My comments to be respectfully forwarded to Alberto Gonzales & Deborah Platt Majoras:

\* Our company (IDTELi) has a cause we feel helps businesses prevent ID theft in the workplace. We provide a formal ID theft education program "employers" can use as a tool to educate employees about ID theft awareness & prevention in the workplace. We feel we are providing a VERY valuable service to the business community but are OFTEN told by companies they will NOT provide this education UNTIL there is specific language in the law requiring them to "educate on identity theft prevention." This is very sad... MSU says 50% of identity theft occurs in the workplace yet not ONE company we've engaged with has a formal program in place to educate ALL employees. Every company we have encountered offering education is limited to personal prevention "tips" provided through newsletters and email with no way of proving employees have even read. Or they provide workshops and offer them to employees to attend on a volunteer basis with no way of determining if they were attentive and remember any of the information shared.

\* Point - Since formal education will surely help to mitigate "preventable" ID theft, this language (simply stated -- "Employers are required to provide formal identity theft education) should be included in the law. I say this based on feedback from many businesses small and large. There is a reluctance on the part of most businesses we've encountered to provide "education" UNLESS they are forced because they feel ID theft in the workplace is of little concern -- although we hear everyday in the news about the number of colleges, corporations, financial institutions, non profits etc. who are hit with ID theft and information breaches.

\* Current laws address requiring employees to be "trained" on company privacy policies and procedures but there is nothing in any ID theft law we have read that mandates employees to specifically be "educated" on identity theft prevention.

In Summary --

IDTEL believes the global ID theft problem will continue to escalate and cost governments, the private sector and their employees BILLIONS unless education (and the word "educate" is clearly stated), which is CENTRAL to prevention, is mandated

through law. How does that saying go? "An ounce of prevention is worth a pound of cure."

Companies will continue to cost governments and tax paying consumers unnecessary dollars in combating "preventable" ID theft. We had an independent research firm conduct a nationwide survey of 2,000 respondents and approximately 1.35% attended ID theft prevention classes offered in their community and .25% actively research information on their own. So even with the efforts of the FTC, law enforcement and the vast number of resources available, people are not actively availing themselves of vital prevention education.

It is sad business in this country at large are demonstrating they do not feel compelled to help prevent ID theft in the workplace by adopting formal education programs with any efficacy as part of their best-practices and would rather roll the dice until State and Federal laws mandate they do so. Until this happens, government and law enforcement will continue to be overwhelmed with this problem reaching epidemic proportions and continue to spend BILLIONS in fighting the problem. Here is what I have to say to all businesses and all government officials who are not ensuring EVERY employee is being given formal education, "If you aren't part of the solution, you are part of the problem."

Regards,  
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